

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

K.A.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES LTD, a foreign entity;
MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
a foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO,
a foreign individual; VISA INC., a
Delaware corporation; REDWOOD
CAPITAL MANAGEMENT, LLC, a
Delaware limited liability company;
REDWOOD DOE FUNDS 1-7;
COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04786-WLH-ADS

**[PROPOSED] ORDER GRANTING
JOINT STIPULATION TO
REQUEST LIMITED
COORDINATION FOR PURPOSES
OF RESPONDING TO
COMPLAINTS IN RELATED
CASES**

1 On October 4, 2024, Plaintiff K.A. (“Plaintiff”) and Defendants MindGeek
2 S.à.r.l., MG Freesites Ltd, MindGeek USA Incorporated, MG Premium Ltd, MG
3 Global Entertainment Inc., 9219-1568 Quebec Inc., Bernd Bergmair, Feras Antoon,
4 David Tassillo, Visa Inc., Redwood Capital Management, LLC, and Colbeck Capital
5 Management, LLC (collectively, “Defendants”; Defendants together with Plaintiff,
6 the “Parties”), filed a Joint Stipulation to Request Limited Coordination for Purposes
7 of Responding to Complaints in Related Cases (the “Joint Stipulation”).

8 The Court, having considered the Parties’ Joint Stipulation, and finding good
9 cause therefor, hereby GRANTS the Joint Stipulation and ORDERS as follows:

10 (1) the deadline for each of the Defendants to answer, move, or otherwise
11 respond to the complaints in each of the Related Cases is **October 21, 2024**;

12 (2) in response to the complaints in each of the Related Cases, each defense
13 counsel shall file one omnibus motion to dismiss in the Related Cases on behalf of
14 the parties that they represent. This omnibus motion shall include any case-specific
15 issues raised in any of the complaints in the Related Cases and may incorporate by
16 reference the arguments made by the Parties in the motion to dismiss briefing in
17 *Fleites v. MindGeek, S.à.r.l, et al.*, Case No. 2:21-cv-04920-WLH-ADS (C.D. Cal.
18 June 17, 2021) (“*Fleites*”). This omnibus motion shall be filed in the above-
19 captioned case, *K.A. v. MindGeek, S.à.r.l, et al.*, Case No. 2:24-cv-04786-WLH-ADS
20 (C.D. Cal. June 7, 2024), and the filing Defendant shall file a notice referencing the
21 filing of the omnibus motion in the 13 other Related Cases;

22 (3) the deadline for Plaintiffs’ counsel in the Related Cases, Brown Rudnick
23 LLP, to file a single omnibus opposition to all of the Defendants’ motions to dismiss
24 filed in the Related Cases, which may incorporate by reference the arguments made
25 by the Parties in the motion to dismiss briefing in the *Fleites* case, is **November 26,**
26 **2024**. Plaintiffs’ counsel shall file their omnibus opposition in the above-captioned
27 case, with notices referencing the omnibus opposition filed in the 13 other Related
28 Cases;

(4) Each defense counsel is permitted to file one omnibus reply in support of their respective motion to dismiss filed in the Related Cases by **December 17, 2024**. Defendants shall file their omnibus replies in support of their respective omnibus motions in the above-captioned case, with notices referencing the omnibus reply filed in the 13 other Related Cases;

(5) A hearing is set for Defendants' omnibus motions to dismiss in the Related Cases **on January 10, 2025, at _____**;

(6) the page limit for each Defendant's omnibus motion to dismiss is 50 pages;

(7) the page limit for Plaintiffs' single omnibus opposition is 85 pages; and

(8) the page limit for each Defendant's omnibus reply in support of motion to dismiss is 35 pages.

IT IS SO ORDERED.

DATED:

By: _____

HON. WESLEY L. HSU
UNITED STATES DISTRICT JUDGE